noveon.

8EHQ-0404-15550

MR# 274666

Kenneth J. Willings

Health, Safety & Environmental

Vice President

Noveon, Inc. 9911 Brecksville Road Cleveland, Ohio 44141-3247 Tel: 216, 447,5636

Fax: 216.447.5925 ken.willings@noveoninc.com RECEIVED

04 APR 14 AM 10:55

April 13, 2004

Certified Mail

Document Processing Center (7407) Attention: TSCA Section 8(e) Coordinator Office of Pollution Prevention and Toxics U.S. Environmental Protection Agency 1200 Constitution Avenue, N.W. Washington, DC 20460-0001

Contain No CBI

Re:

TSCA 8(e) Submission of Benzyl Benzoate, Benzyl Salicylate, Alphaamylcinnamaldehyde, and Nonanal Algal Inhibition Studies: Cover Letter Correction

Dear Sir or Madam:

Noveon, Inc. (Noveon) is providing a corrected cover letter pursuant to its April 12, 2004 submission under Section 8(e) of the Toxic Substance Act (TSCA) to inform EPA of the findings of algal inhibition studies on benzyl benzoate, benzyl salicylate, alpha-amylcinnamaldehyde, and nonanal. The original cover letter identified nonanal (CAS# 124-19-6) in the text but did not identify it in the title.

None of the information in this correction is claimed as confidential business information.

If you have any questions, please contact Dr. Robert K. Hinderer at 216-447-5181 or robert.hinderer@noveoninc.com.

Sincerely,

My. Willy Kenneth J. Willings Vice President HS&E

CC:

Tim Adams, Ph.D. (FFHPVC) Robert K. Hinderer, Ph.D.





MR# 274666

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Kenneth J. Willings Vice President Health, Safety & Environmental

April 12, 2004

Certified Mail

Document Processing Center (7407) Attention: TSCA Section 8(e) Coordinator Office of Pollution Prevention and Toxics U.S. Environmental Protection Agency 1200 Constitution Avenue, N.W. Washington, DC 20460-0001

Re:

TSCA 8(e) Submission of Benzyl Benzoate, Benzyl Salicylate, Alpha-amylcinnamaldehyde, and

Nonanal Algal Inhibition Studies (Corrected Title)

Dear Sir or Madam:

Noveon, Inc. (Noveon) submits this letter pursuant to Section 8(e) of the Toxic Substance Act (TSCA) to inform EPA of the findings of algal inhibition studies on benzyl benzoate, benzyl salicylate, alphaamylcinnamaldehyde, and nonanal. Noveon has not made a determination as to whether a significant risk of injury to health or the environment is actually presented by the findings.

Benzyl benzoate (CAS# 120-51-4), benzyl salicylate (CAS# 118-58-1), alpha-amylcinnamaldehyde (CAS# 122-40-7), and nonanal (CAS# 124-19-6) were tested by the Flavor and Fragrance High Production Volume Consortia's in accordance with its commitment to the EPA High Production Volume Chemical Program. The acute toxicity studies indicate that these chemicals are highly toxic to the freshwater alga, Selenastrum capricornutum. In view of these findings, Noveon has elected to inform the EPA.

The final reports are enclosed.

None of the information in this submission is claimed as confidential business information.

If you have any questions, please contact Dr. Robert K. Hinderer at 216-447-5181 or robert.hinderer@noveoninc.com.

Sincerely,

Kutt, Willing Kenneth J. Willings Vice President HS&E

CC:

Tim Adams, Ph.D. (FFHPVC) Robert K. Hinderer, Ph.D.